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October 30, 1992

EG&G ROCKY FLATS INC

92-RF-12966

Robert M Nelson, Jr Manager DOE, RFO

Attn R J Schassburger

INTERAGENCY AGREEMENT (IAG) FY93 MILESTONE STATUS BY OPERABLE UNIT (OU) - RLB-0697-92

Ref R L Benedetti Itr, 92-RF-12514, to R M Nelson, Jr, Interagency Agreement (IAG) Milestone Status, October 22, 1992

In accordance with the above-referenced letter regarding the Interagency Agreement (IAG) milestone status, please consider this letter as written notification as promised This written documentation is to formally reiterate information to the DOE/RFO Project Managers about FY93 milestones that will be missed

Nine FY93 milestones will be missed. As previously stated, Operable Unit (OU) 1 will miss four milestones in FY93 due to previous schedule extensions (extensions for these milestones have been requested). OU 2 will miss two FY93 milestones due to the DOE/RFO decision to postpone the Bedrock program as referenced in the following letters. Kersh to Hartman, 92 RF-10377, dated September 4, 1992, Kersh to Nelson, 92-RF-4570, dated April 24, 1992, Hartman to Kersh, ERD SG 3049, dated March 24, 1992, Kersh to Nelson 92-RF-1730, dated February 28, 1992, Hartman to Benedetti, ERD SG 11335, dated September 25, 1992, draft, and letter, Hestmark to Baughman to Hartman, dated April 2, 1992. OU 3 will miss one FY93 milestone due to problems in gaining access to offsite private areas. OU 4 will miss one milestone in FY93 due to problems in removing sludge from the Solar Evaporation Ponds. OU 6 will miss one FY93 milestone due to delays in the ability to start field work activities.

OU 1 and OU 2 have previous, sufficient documentation as noted in the referenced letter, and therefore, require no further iteration. The OU 4 milestone will be addressed in a separate letter.

The IAG schedule for OU 3 includes the submittal of the Draft RCRA Field Investigation/ Remedial Investigation (RFI/RI) Report on July 16, 1993. This milestone will be missed by approximately four to five months. Delays in the IAG schedule for OU 3 have occurred throughout FY92. Several different factors have contributed to the delay in field work implementation for OU 3. These factors include delay in the approval of the RFI/RI Work Plan from the regulatory agencies, delays in FY92 budget guidance, delays in obtaining a NEPA-required Categorical Exclusion (CX) for sampling, the

**ADMIN RECORD** 

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Robert M Nelson, Jr October 30, 1992 92-RF-12966 Page Two

potential presence of a threatened plant species, and the inability to obtain access to offsite private areas

Operable Unit No 5 does not have any FY93 milestones, however, the Draft RFI/RI Report milestone in the first quarter of FY94 will be missed by approximately five months because of delays in starting field work activities. The schedule for OU 5 field activities slipped due to delays in approval of the Work Plan by the regulatory agencies and an extensive and lengthy procurement process.

Operable Unit No 6 will miss the Draft RFI/RI Report submittal milestone due on August 4, 1993 by approximately nine months. This project is behind schedule because approval of the Work Plan from the regulatory agencies was late by four months. A perceived Organizational Conflict of Interest, delayed the OU 6 procurement process for field activities and the project by an additional six weeks. Additional delays were incurred by OU 6 from non-scheduled activities such as the overall procurement process (two months) and Health and Safety Plan approval (two months).

It must also be noted to the DOE/RFO Project Managers that delays in FY93 milestones will have downstream effects in the out years. If you require additional information, please feel free to contact me at extension 8540

Robert L Benedetti

Associate General Manager

Environmental Restoration Management

SG8:dmf

Orig and 1 cc - R M Nelson, Jr

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R H Birk - DOE, RFO

S R Grace - DOE, FFO

J Pepe - DOE, RFO